



## Friends of the Santa Clara River

660 Randy Drive, Newbury Park, California 91320-3036 • (805) 498-4323

July 17, 2007

Ms. Deborah Smith  
Interim Executive Officer  
Los Angeles Regional Water Quality Control Board  
320 West Fourth Street, Suite 200  
Los Angeles, CA 90013

### Board of Directors

Ron Bottorff  
*Chair*  
Barbara Wampole  
*Vice-Chair*  
Ginnie Bottorff  
*Secretary*

**Re: Comments on the Tentative Waste Discharge Requirements (WDRs) and National Pollutant Discharge Elimination System Permit (NPDES) – Newhall Ranch Water Reclamation Plant (NPDES Permit No. CA0064556)**

Dear Ms. Smith,

### Affiliated Organizations

California Native Plant Society  
L.A./Santa Monica Mountains Chapter

Santa Clarita Organization for Planning the Environment (SCOPE)

Sierra Club  
Angeles Chapter  
Los Padres Chapter

### Surfrider Foundation

Audubon Society  
Ventura Chapter

Ventura County Environmental Coalition

Wishtoyo Foundation

Friends of the Santa Clara River offer the following comments on the subject permit.

Since the affected reach of the Santa Clara River is already impaired for chlorides and ammonia, it is imperative that no permits be issued that will worsen the situation. The Newhall Ranch facility is intended to serve "villages" that will be built out over the next 20 to 30 years. No tract maps have yet been approved. It is not possible to predict all future conditions in the river that might dictate more restrictive discharge requirements. Thus we believe it would be prudent to do the permitting in stages as the project is built that would allow for potentially more stringent requirements in the future.

We note that Newhall plans extensive reuse of treated effluent. It seems to us this should be addressed in the permit.

Don Davis, a past member of our Board of Directors, feels that the fecal and E coli limits are fairly lax for a tertiary facility.

We also would like to express our general agreement with several comments made by Heal the Bay on the subject Tentative WDRs and NPDES Permit. In summary, we concur on these specific issues:

**1. Sufficient baseline receiving water monitoring should be conducted prior to discharge.**

Baseline monitoring data is extremely important to understand any impacts to that Santa Clara River that may result from the discharge. In addition to priority pollutant monitoring, bioassessment monitoring should be conducted twice before the discharge begins.

**2. The discharger should conduct influent, effluent and receiving water monitoring for all of the priority pollutants within the first month of discharge.**

**3. The Regional Board should increase bioassessment monitoring frequency to twice per year.**

Bioassessment monitoring should take place on a more frequent basis than is required in the Tentative Permit. Monitoring at least twice per year – ideally in the spring and fall -- to capture conditions before the rainy season and after the rainy season, would be appropriate

**4. The Regional Board should clarify the spill monitoring requirements.**

Definitions of “feasible” and “accessible” are required as regards spill monitoring, and should not be left up to the discharger.

**5. The Regional Board should use the average effluent discharge flow.**

This number represents the actual flow volume. By utilizing the design flow, much higher mass emissions are allowed than is merited based on plant operation.

**6. The management plan for the brine that is generated in the reverse osmosis treatment process should be evaluated in the Permit findings.**

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in cursive script that reads "Ron Bottorff". The signature is written in dark ink and is positioned above the printed name.

Ron Bottorff, Chair